

**Before the
Federal Communications Commission
Washington, D.C. 20554**

SEP 15 1987

In the Matter of)
) ET Docket No. 97-157
Reallocation of Television Channels)
60-69, the 746-806 MHz Band)
)

To: The Commission

COMMENTS OF KSLS, INC.

KSLS, Inc., licensee of Station KSCI(TV), San Bernardino, California, hereby submits its Comments with respect to the Commission's Notice of Proposed Rulemaking ("*NPRM*") in the above-captioned proceeding.

KSCI broadcasts on channel 18 with over three million watts effective radiated power. In 1985, the Los Angeles County Sheriff asked the FCC for authority to use UHF television channels for public safety communications. At that time, KSCI cautioned the FCC that there was a large potential for interference between public safety and television facilities operating in the UHF band. Nonetheless, three channels were allocated for public safety communications: channels 14, 16 and 20. Even though KSCI has always maintained out-of-band transmissions within FCC specifications and is separated from channels 16 and 20 by one channel, the Los Angeles County Sheriff has often experienced interference problems on its public safety frequencies. KSCI's experience in Los Angeles demonstrates that high power television and low power public safety services should not be required to operate in such close proximity to each other.

In the FCC's recent DTV channel allocation, and apparently to protect the channel 14, 16 and 20 land mobile services, not one channel was assigned below channel 22 in Los Angeles.

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However, all but one channel between channels 60 through 69 was assigned to DTV service. This means that in the Los Angeles area, where there is a need for more public safety radio services, there will be no additional spectrum available for public safety usage until after 2006, when NTSC transmissions are discontinued. As a result, users of public safety spectrum in Los Angeles will not be able to take advantage of interoperability of communications with other communities and services until that date. Furthermore, all DTV stations assigned to channels 60 through 69 will have to build new facilities to change channels when they are required to relocate to "core" DTV channels at the end of the DTV transition.

Many of the TV stations in the Los Angeles DMA filed Petitions for Reconsideration concerning the FCC's recent allocations of DTV channels. KSCI recognizes that the FCC made a great effort to provide every station with an adequate DTV allotment. Nonetheless, the FCC's DTV allotment table provides less than acceptable allocations for the Los Angeles DMA stations. This is because (1) there are relatively few vacant channels available for use in the Los Angeles DMA; (2) several vacant channels are unusable because of Mexican treaties; and (3) the lower portion UHF channels cannot be used as long as the channels 14, 16 and 20 land mobile services must be protected.

Accordingly, KSCI would like to suggest that the FCC move the land mobile services presently operating on channels 16 and 20 to channels 68 and 69. Station KRCA was assigned channel 69 for DTV service and has petitioned the FCC for a different channel allocation because of potential interference with land mobile operations assigned to adjacent channel 70.¹ Further,

¹ In the Matter of Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service, Sixth Report and Order, MM Docket No. 87-268, FCC 970115 (released April 21, 1997).


channel 67 is used in Mexico and is not available for television use in the Los Angeles area. KSCI thus believes that channel 67 would be a satisfactory "guard band" between the two services. In addition, Los Angeles public safety services would immediately be able to take advantage of interoperability, while up to six Los Angeles DMA TV stations could be awarded DTV allocations in the lower UHF channels. Moreover, if the land mobile services were moved to channels 68 and 69 within the next two years, KSCI's proposal would not cause a significant delay in the construction of new DTV stations.

Finally, KSCI opposes the Commission's proposal to divide Public Safety spectrum into two 12 megahertz blocks. When two different types of services are combined within the same frequency band, it usually causes inefficient use of the spectrum. In many cases spectrum is wasted on empty guard bands, or one service must reduce its power to protect the other service. Coordination of frequencies is easier and more efficient when only one service is involved and does not have to design its facilities to accommodate the concerns of other users.

WHEREFORE, KSCI respectfully requests the Federal Communications Commission adopt rules in this proceeding fully consistent with the foregoing statement.

Respectfully submitted,

KSLS, Inc.

By: 

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